

**SHERWIN-WILLIAMS RESPONSE TO EPA COMMENTS
ON AUGUST 2003 WORK PLAN
NOVEMBER 24, 2003**

ITEM	DOCUMENT	PAGE/ SECTION	REQUIREMENT	QUESTION/COMMENT/ TEXT CHANGE	RESOLUTION	SHERWIN-WILLIAMS ACTION
1	WP	p. 2-2, Section 2.2.2.1, 2 nd paragraph	Change 1967 to 1930	Request that we delete this sentence since EPA and SW are in disagreement and it is not integral to the work to be performed.	EPA is willing to delete this sentence in order to move forward on conducting the field investigation work.	Sentence has been deleted.
2	WP	p. 2-10, Section 2.4, 2 nd paragraph	Language was inserted, "...a plant manager at the Gibbsboro paint manufacturing facilities..."	Why was this verbiage added? Mr. Hollinger purchased the property as an individual not as an agent on behalf of the company.	EPA is willing to delete "...a plant manager at the Gibbsboro paint manufacturing facilities..." in order to move forward on conducting the field investigation work.	Portion of sentence has been removed.
3	WP	p. 2-10, Section 2.4, 2 nd paragraph	New language was inserted	Since new language was added, SW would like to add a sentence at the end of the paragraph for clarification: <i>"The site was proposed but not placed on the NPL."</i>	EPA is willing to add the following sentence to this paragraph, <i>"The site was proposed for the National PriorityList (NPL) on July 28, 1998 but has not been placed on the final NPL as of the writing of this RI/FS Work Plan."</i>	EPA's language has been added.
4	WP	p. 2-10 and 2-11, Section 2.4, 4 th paragraph	New language was inserted	For clarification, we would like to add the following: 1. Insert <i>"According to EPA,"</i> a small pond..." 2. Insert <i>"According to EPA,"</i> the 1940 and 1951..." 3. Delete the sentence "This timeframe is during...." The sentence is not accurate since SW did not own the property; John Lucas & Company was the owner.	1. EPA is not willing to insert <i>"According to EPA,"</i> a small pond..." as requested by SWC since the current sentence in the RI/FS Work Plan is an exact quote from EPA's 1997 Aerial Analysis and it is already implied at the begin of the sentence that this is an aerial analysis performed by EPA. 2. EPA is willing to add the following in order to move forward on conducting the field investigation work: Insert <i>"According to EPA,"</i> the 1940 and 1951..." as requested by SWC. 3. EPA believes the sentence noted in SWC's text change #3 should remain in the RI/FS Work Plan. If refer to 1 st paragraph of Section 2.2.2.1 of the RI/FS Work Plan, it indicates that pursuant to an agreement dated December 24, 1929 between The Sherwin-Williams Company, an Ohio Corporation, and John Lucas & Co., Inc., a Pennsylvania corporation, The Sherwin-Williams Company created a new corporation incorporated under the laws of Delaware known as John Lucas & Co., Inc. From 1930 to 1935, John Lucas & Co., Inc., the Delaware Corporation, was operated as a subsidiary of The Sherwin-Williams Company. The sentence <i>"This timeframe is during...."</i> Will remain in the RI/FS Work Plan.	1. SWC's language has not been added. 2. EPA's language has been added. 3. SW submitted alternative language for this sentence on November 19, 2003. This language was agreed to by EPA on November 21, 2003 with minor modifications. The modified sentence was placed in the text.

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5	WP	p. 2-11, Section 2.4, 6 th paragraph	New language was inserted	What is the basis for the statement “commercial facility did not appear to have caused contamination above NJDEP cleanup standards.” We were unable to locate an NJDEP document that makes this statement.	NJDEP document is referenced (reference # 45) in the <i>Final Hazard Ranking System Evaluation Route 561 Dump</i> , revised date July 1998. This reference was reviewed based on SWC’s question noted in item #5. Consequently, the sentence has been edited as follows, <i>“According to NJDEP reports, the discharge contained such a low level of PCE at the time that the sampling was conducted, no evidence exists indicating that PCE was present in the septic system and the septic tanks were completely emptied and the discharge now goes to the public sewer system. All effluent from the adjacent site currently, and since 3 February 1993, discharge to the Camden County Municipal Utility Authority.”</i>	EPA’s language has been added.
6	WP	p. 2-14, Section 2.8, 7 th paragraph	No requirement	Would like to remove the paragraph “Pursuant to an agreement...”. This paragraph is not relevant to this section of the Work Plan and must have been mistakenly placed in this section during editing. Would be confusing to readers.	Since this paragraph is already specified in Section 2.2.2.1, EPA is willing to delete this paragraph from Section 2.8 in order to move forward on conducting the field investigation work.	Paragraph has been deleted.
7	WP	p. 3-7, Section 3.1.4, 8 th paragraph	Sentence regarding USTs was deleted	What is the basis for removing this sentence? This sentence is accurate and relevant to the discussion.	Following sentence regarding the USTs may be included in the RI/FS Work Plan, “ <i>Two USTs of unknown capacity are located at the site.</i> ” The last sentence which claims that the USTs were registered with the State in March 1989 has been deleted. NJDEP indicated that according to the Department’s database, these tanks were never registered	Sentence is deleted.
8	WP	p. 3-15, Section 3.2.1.1, Lead, Block 23, p. 3-15, paragraph beginning with “The highest lead...”	No requirement. Typographic correction needed.	Two words are missing in the last sentence that begins with “Additional sampling...”. Would like to insert “ <i>was conducted</i> ” after “sampling”.	SWC can insert “ <i>was conducted</i> ” after “sampling” and delete “near” and replace with “ <i>at the following locations:</i> ” before, “B-45 (1,740 mg/kg) and...” as SWC specified in the electronic version of the Work Plan but did not note in this table of additional items.	Language has been modified.
9	WP	p. 3-22, Section 3.2.1.1, North of Block 23, VOC	No requirement. Typographic correction needed.	Two extra words are included in the sentence beginning with “The samples...”. Would like to remove “The samples”.	SWC can remove “The samples” at the beginning of the sentence.	“The samples” was deleted.

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10	WP	p. 3-23, Section 3.2.1.1, North of Block 23, SVOC, paragraph beginning with "In summary..."	Sentence was deleted "The roadway may have contributed...."	What is the basis for removing this statement? (Same issue as found in Item 15 and 17 below).	It is feasible that SWC's waste disposal practices in and around the site are a major contributor to the contamination being discovered at the site. Further, EPA clarified in the RI/FS Work Plan the location of sample point SB-15 where the SVOCs were discovered. It is our understanding that it is not adjacent to the roadway but is at least 12 feet away from the EPA- erected fence, approximately 19 feet from the roadway; and of some relevance, the SVOCs were discovered 2-2.5 feet bgs where the lead levels increased by a factor of 16 from the ground surface and where levels of other metals such as arsenic exceeded applicable standards.	Sentence was deleted, but we repaired the run-on sentence.
11	WP	p. 3-30, Section 3.2.1.3, 4 th paragraph	Language was added	Would like to delete "on the incorrect surface water quality criteria" and replace with "NJDEP FW2 Surface Water Quality Criteria". This was the correct criteria to use when performing the work for NJDEP. Also, would like to revise the next sentence by deleting "Therefore, they..." and replace with " <i>The NJDEP criteria...</i> ". (Same issue as found in Item 18 below).	EPA is willing to agree to the changes in this paragraph in order to move forward on conducting the field investigation work.	Language SWC inserted remains.
12	WP	p. 3-39, Section 3.2.2.1, paragraph beginning "From 2 August..."	No requirement. Typographic correction needed.	"identify" in the second to last sentence should be changed to "identifying"	SWC can change the word to " <i>identifying</i> ".	Change was made.
13	WP	p. 3-40, Section 3.2.2.1, paragraph beginning "A total of 25 samples..."	No requirement. Technical clarification needed.	Would like to add "A total of 25 <i>out of 158</i> samples submitted for lead..." (number taken from E&E trip report).	SWC can add " <i>out of 158</i> " in order to move forward on conducting the field investigation work.	Language was added.
14	WP	p. 3-41, Section 3.2.2.1, last sentence in section	No requirement. Typographic correction needed.	The date of the Weston report needs to be changed to 29 September 1998. This is the date of the final report approved by Tom Budroe of the Removal Branch.	SWC can change the date of the report to " <i>29 September 1998</i> ".	Date was changed.
15	WP	p. 3-47, Section 3.2.5.1	Last sentence in section was deleted	What is the basis for removing this sentence? (Same issue as found in Item 10 above and 17 below).	The following sentence has been placed into this section of the RI/FS Work Plan, " <i>The SVOCs detected may be attributable to roadway runoff or runoff from the adjacent railroad tracks.</i> "	EPA's language was added.

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16	WP	p. 3-51, Section 3.2.6.1.2, #2, between 2 nd and 3 rd paragraph	No requirement. Technical clarification needed.	Would like to add sentences to provide clarification for the reader. <i>"In September 1996 Sherwin-Williams conducted a remedial action to address contaminated soils behind the Police Station. The work was documented in the Remedial Action Report, Police Station Area and Storm Sewer Replacement prepared by Weston and submitted to NJDEP on June 15, 1998. A summary of activities is presented below."</i>	EPA is willing to include SWC's recommended sentence in order to move forward on conducting the field investigation work.	SWC's sentence has been incorporated.
17	WP	p. 3-54, Section 3.2.6.1.3, 4 th paragraph	A sentence was removed	What is the basis for removing this sentence that begins "The source of lead...."? (Same issue as Items 10 and 15 above).	The following sentence has been placed into this section of the RI/FS Work Plan, <i>"The source of lead and PAH compounds in sediments is potentially related to soil contamination within the area and road and parking lot runoff related to storm runoff."</i>	The original sentence has been added back with EPA's grammatical edits..
18	WP	p. 3-55, Section 3.2.6.1.4, 2 nd paragraph	Language was added	Would like to delete "on the incorrect surface water quality criteria" and replace with "NJDEP FW2 Surface Water Quality Criteria". This was the correct criteria to use when performing the work for NJDEP. Also, would like to revise the next sentence by deleting "Therefore, they" and replacing with "The NJDEP criteria". (Same issue as Item 11 above).	EPA is willing to agree to the changes in this paragraph in order to move forward on conducting the field investigation work.	Language inserted by SWC remains unchanged
19	WP	p. 3-59, Section 3.2.6.2.3, 6 th paragraph, 2 nd sentence	No requirement. Typographic correction needed.	Would like to insert "and" between acetone,-several.	EPA is willing to agree to the change in order to move forward on conducting the field investigation work.	"And" has been added.
20	WP	p. 3-59, Section 3.2.6.2.3, 7 th paragraph	A sentence was removed	What was the basis for removing the sentence that begins "The samples were analyzed for TCL...."?	Sentence was inadvertently deleted during the editing of the RI/FS Work Plan and has been added to this portion of the section as follows, <i>"The samples were analyzed for TCL and TAL metals, plus cyanide and hexavalent chromium."</i>	The sentence has been added back into the text..
21	WP	p. 3-64, Section 3.2.6.2.5, paragraph beginning "During the September", last sentence	Language was added. Technical clarification required.	We believe that "51 compounds" should read "51 samples". Also, a table reference will be included.	EPA is willing to add <i>"51 samples"</i> . Also, as SWC has indicated a table reference will need to be included by SWC and the data referenced in this paragraph needs to be included into the tables portion of the RI/FS Work Plan.	"compounds" has been changed to "samples". Table reference was added.

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22	WP	p. 3-64 and 3-65, Section 3.2.6.2.5, paragraph beginning "At the writing of this"	Technical clarification required.	Replace the paragraph with "Additional work was completed at 165 Kirkwood Drive and the data from those investigations has been incorporated in the data table attached to this work plan. The investigations were summarized in the report entitled "Removal Action Report, Hilliard Creek Site, Gibbsboro, New Jersey", dated May 2002. Work was also conducted along the embankments of Kirkwood Lake, downstream of the area covered in this work plan. That work was presented to the EPA in the report entitled: "Removal Action, Addendum Report, Kirkwood Lake, Hilliard Creek Site" dated March 11, 2003. The results of those activities are not presented in this work plan."	EPA is willing to add the following paragraph, "Additional sampling was completed at 165 Kirkwood Drive and the data from those investigations has been incorporated in the data table attached to this work plan. The investigations were summarized in the report entitled "Removal Action Report, Hilliard Creek Site, Gibbsboro, New Jersey", dated May 2002. Sampling was also conducted along the embankments of Kirkwood Lake, downstream of the area covered in this work plan. That sampling was presented to the EPA in the report entitled: "Removal Action, Addendum Report, Kirkwood Lake, Hilliard Creek Site" dated March 11, 2003. The results of those sampling activities are not presented in this work plan but may be incorporated into any future addendum to this RI/FS Work Pan."	EPA's language has been added.
23	WP	p. 3-64, Section 3.2.6.2.5, paragraphs beginning "Surface water samples", Ten samples, Surface water samples".	Technical editing clarification required.	Would like to merge all three paragraphs to provide better clarification for the reader. Also, add the word "The" to the beginning of the last paragraph.	EPA is willing to merge these three paragraphs into one in order to move forward on conducting the field investigation work.	Paragraphs have been merged.
24	WP	p. 3-65, Section 3.2.6.2.5, last paragraph in section beginning "Subsequent to April 2000..."	No requirement.	Would like to remove this paragraph given new language proposed above.	<p>Paragraph will remain in the RI/FS Work Plan and has been re-written to address SWC's request to add language specified in item # 22 above. The paragraph will now read, "Subsequent to April 2000, Sherwin-Williams has undertaken additional removal activities some of which have been noted above. These removal activities are still ongoing and any relevant information pertaining to these removal activities may be incorporated into any future addendum to this RI/FS Work Plan."</p> <p>Appendix 1 of the September 30, 1999 AOC for a RI/FS specifies that all existing data for the Sites shall be thoroughly compiled and reviewed. Further, Appendix 1 indicates that this information shall be utilized in determining additional data needed to characterize the Sites and that the decisions on the necessary data shall be made by EPA. Thus, all of the data as it relates to Hilliard's Creek may be incorporated at a future date into the RI/FS Work Plan for EPA's review.</p>	EPA's revisions have been made.

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25	WP	p. 3-67, Section 3.2.7, 7 th paragraph, last sentence	No requirement. Typographic correction and clarification needed.	Would like to replace “if” with “where”. Would also like to reference latest draft Removal Action Report for the Rail Road Track dated August 2000.	EPA is willing to replace “if” with “ <i>where</i> ” in order to move forward on conducting the field investigation work. The reference to the August 2000 Report has also been requested by SWC in item # 28 below. The reference, as re-worded by EPA, will be specified in this section of the RI/FS Work Plan as noted under item #28 and need not be repeated in this portion of the section as well.	Language has been replaced.
26	WP	p. 3-68, Section 3.2.7, 3 rd to last paragraph, last sentence	Language was added and deleted	Would like second half of sentence to be replaced with “(i.e., no further excavation for removal purposes) was taken with the concurrence of EPA Removal Action Branch.” The remainder of the sentence inserted by EPA should be removed.	EPA will not agree to the proposed changes noted by SWC in item #26 and the text will remain as specified in the June 4, 2003 version of the RI/FS Work Plan provided to SWC by EPA. The language as currently specified in the Work Plan by EPA relates to an OSC’s comment (#6) noted in a 10/13/98 letter to SWC with regards to the Removal Action Report for the Rail Road Tracks Area. OSC indicates in his comment that it was in compliance with the order with the exception of two locations noted in the report. OSC indicated that there were areas where levels of lead and arsenic were left exceeding the removal criteria levels.	EPA’s language remains.
27	WP	p. 3-68, Section 3.2.7, 2nd to last paragraph, last sentence	Language was added	Would like to delete “at this time”. It was agreed to complete no other work under the Removal Order. Sentence suggests otherwise.	SWC cannot delete “at this time” from the RI/FS Work Plan. This sentence relates to an OSC’s comment (#31) noted in a 10/13/98 letter to Sherwin-Williams with regards to the Removal Action Report for the Rail Road Tracks Area. The OSC indicated in his comment that the possibility of excavating this material in the future was not precluded. Excavation may potentially be conducted if it is deemed the appropriate remedial action for this area.	Language has not been deleted.
28	WP	p. 3-68, Section 3.2.7, last paragraph	No requirement. Technical clarification required.	Reference the draft Removal Action Report for the Rail Road Track dated August 2000 for further information.	The electronic version of this section provided by SWC to EPA in August 2003 erroneously specifies the report noted in item #28 as a “Remedial” Action Report. The wording needs to be changed to designate it as a “ <i>Removal</i> ” Action Report since it was submitted as part of a removal order and not a remedial order.	The report name has been changed to “Removal”.
29	WP	p. 3-68, Section 3,2,8, first paragraph	No requirement. Technical editing required.	Add “s” to findings.	SWC can add “s” to the end of the word “finding”.	The “s” has been added.
30	WP	p. 3-73, Section 3.2.8.3.1, Former Tank Farm A, 1 st paragraph	No requirement. Technical clarification required.	Would like to add a sentence at the beginning of the paragraph. “ <i>Sampling was conducted in Tank Farm A between August 1991 and January 2000.</i> ”	SWC can add the following sentence at the beginning of the paragraph, “ <i>Sampling was conducted in Tank Farm A during five phases of investigations that occurred between August 1991 and January 2000.</i> ”	EPA’s language has been added.

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31	WP	p. 3-74, Section 3.2.8.3.1, North of Tank Farm A, 1 st paragraph	No requirement. Technical clarification required.	Would like to add a sentence at the beginning of the paragraph. <i>"Sampling was conducted in the area north of former Tank Farm A between June 1993 and January 2000."</i>	SWC can add the following sentence at the beginning of the paragraph, <i>"Sampling was conducted in the area north of former Tank Farm A during four phases of investigations that occurred between June 1993 and January 2000."</i>	EPA's language has been added.
32	WP	p. 3-74, Section 3.2.8.3.1, Area North of Foster Ave., 1 st paragraph	No requirement. Technical clarification required.	Would like to add a sentence at the beginning of the paragraph. <i>"Sampling was conducted in the area north of Foster Avenue between June 1993 and January 2000."</i>	SWC can add the following sentence at the beginning of the paragraph, <i>"Sampling was conducted in the area north of Foster Avenue during four phases of investigations that occurred between June 1993 and January 2000."</i>	EPA's language has been added.
33	WP	p. 3-75, Section 3.2.8.3.1, Seep Area, 1 st paragraph	No requirement. Technical clarification required.	Would like to add a sentence at the beginning of the paragraph. <i>"Sampling was conducted in the Seep Area between August 1991 and January 2000."</i>	SWC can add the following sentence at the beginning of the paragraph, <i>"Sampling was conducted in the Seep Area during five phases of investigations that occurred between August 1991 and January 2000."</i>	EPA's language has been added.
34	WP	p. 3-75, Section 3.2.8.3.1, Former Pump House, 1 st paragraph	No requirement. Technical clarification required.	Would like to add a sentence at the beginning of the paragraph. <i>"Sampling was conducted in the former pump house area September 1996 and January 2000."</i>	SWC can add this sentence to the beginning of the paragraph for the former pump house.	The sentence has been added.
35	WP	p. 3-85, Section 3.3.1, #3, New Jersey State, 3 rd bullet	No requirement. Typographic correction required.	Replace "water" with "Water".	SWC can make the change.	The change has been made.
36	WP	p. 3-92 and 3-93, Section 3.4.2.3	Paragraph was added	Suggest removing this paragraph since it only lists one of many sediment alternatives. If not, will need to add other viable alternatives such as MNA and capping consistent with recent Region 2 EPA sediment guidance.	EPA is willing to allow SWC to add MNA and capping to this section in order to move forward on conducting the field investigation work.	SWC's requested language has been inserted..

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37	WP	p. 4-4, Section 4.1, bullets beneath sentence beginning with "Although not a site..."	Sentences were deleted.	Do not delete bullets referencing sources; however, insert the word in the sentence above to read "potential sources have been identified..."	The major source of contamination at this site is the historic operations conducted during the more than 100 years of paint manufacturing by Lucas/Sherwin-Williams at this location. Certain source areas have been placed under a separate paragraph with the opening sentence stating, " <i>Additional potential sources raised by Sherwin Williams:</i> " since these areas are not confirmed source areas at this time for the specific activities which were noted in the Work Plan. It is our understanding that disagreements have occurred over the years between the regulatory agencies and SWC over the identification of the sources of contamination; and that SWC had submitted a RI Work Plan Addendum to NJDEP, with a copy to EPA, prior to the termination of the NJDEP order, that entails further sampling at many of the areas under dispute. Bullet titled, "Construction of the parking lot Seep Area" will remain deleted from the RI/FS Work Plan. There is a "seep area" below the parking lot but the construction of the parking lot is not considered a "source" of the contamination.	EPA's language has been inserted.
38	WP	p. 4-4, Section 4.1, paragraph beginning with "Contaminant sources...", 4th sentence.	Language was added to a sentence. Technical editing clarification required.	Rewrite sentence to read " <i>For those portions of the sites that have been fenced-off to limit access, human contact is limited to occasional trespassers.</i> "	EPA is willing to agree to the rewritten sentence in order to move forward on conducting the field investigation work.	Sentence has been rewritten.
39	WP	p. 7-1 and 7-2, Section 7.0	No requirements.	Would like to combine the roles held by Mary Lou Capichioni into one. Would like to replace QA Officer to Ted Toskos Would like to replace Risk Assessment Manager to Teresa Bowers of Gradient.	EPA is willing to agree to the changes noted in item #39. EPA is also willing to agree to the other changes EPA observed were made to Section 7 of the RI/FS Work Plan and Table 7-1 (Key Project Contacts) but were not noted by SWC as having been revised in order to move forward on conducting the field investigation work. These changes include replacing the Sampling Task Manager to G. Mello and the alternate to E. Salazar, replacing the Health & Safety Officer to A. Garrison, replacing Corporate Health & Safety to G. Crawford and alternate to D. Kopcow, replacing the alternate project manager to S. Jones, and replacing the alternate field team leader to R. Gascoyne.	Additional changes have also been made with the resignation of Ted Toskos. These changes were approved by EPA on November 21, 2003. All text and table references in the Work Plan, SAP and QAPP were revised.

Note: Comments address the RI/FS Work Plan document Sections 1, 2, 3, 4, and 7. Many of these issues are repeated in the SAP and QAPP.